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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
DEPUTY	

UNITED STATES DISTRICT COURT NEVADA

BARBARA STUART ROBINSON  
plaintiff,

VS

CITY OF LAS VEGAS

Defendant.

2:24-cv-02417-MDC

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**COMPLAINT**

**VIOLATION OF CIVIL RIGHTS**

with attached Exhibit A

**JURY TRIAL REQUESTED**

Jurisdiction: 28 US CODE 1331

VENUE: Plaintiff is Barbara Stuart Robinson was residing in the City of Las Vegas County of Clark in the State of Nevada until this Incident.

Venue: Defendants are City Government City of Las Vegas owns and operates a City Housing Services Shelter under license City of Las Vegas in Clark County, State of Nevada.

### FACTS

1. On September 16, 2024 City Government/ on Government Property the City of Las Vegas violated Federal Law by Interfering with Plaintiff Barbara Stuart Robinson free exercise of Religious practices/ worship and prohibiting the free exercise thereof on their property in violation of Federal Constitutional Law and the Plaintiff suffered Injury, harm, losses and Damages
2. Because the Government / Government Property City of Las Vegas failed to ensure Federal Constitutional Rights would not be abridged on their Property, that is not Private

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Property, the Plaintiff was wrongfully Removed from City Property based on Religious or Political Freedom for 6.5 months leaving her to lose Community Services and Housing for 6.5 Months and their wrongful act/action and or omissions directly resulted to harm, loss and suffering that stem from a in violation of Civil Rights US CONSTITUTION AMENDMENT 1.

### PLAUSIBLE CLAIM UPON WHICH RELIEF CAN BE GRANTED

BREACH OF RELIGIOUS AND POLITICAL FREEDOM, US CONSTITUTION AMENDMENT 1

#### CLAIM

On September 16, 2024 The City of Las Vegas City Government acting under State Government " a Government/ Government property" owns and operates a homeless shelter in the City of Las Vegas where the Plaintiff Barbara Stuart Robinson is a Registered Guest. On September 16, 2024 the City of Las Vegas/ Employees or Agents thereof; Interfered with Plaintiff Barbara Stuart Robinson Religious Constitutional Rights and violated Federal Constitution Law " Free Exercise Clause" of Religious practices/ worship and prohibiting the free exercise thereof on their Government Property and the Plaintiff suffered losses because the readily quantifiable effects of the defendant's wrongful actions caused the plaintiff to **lose Community Services and Housing by Enforcing upon her a Trespass** due to Religious Reasons or Practices in violation of Federal Constitutional Law, 1ST Amendment Const. Were citizens' right to practice their religion as they choose without interference from the government has abridged rights and deprived the plaintiff of Rightful law that should have prevented the City of Las Vegas from Trespass or Removing the Plaintiff for 6.5 months due to Religious purposes or Reasons but because the City of Las Vegas thought there was something wrong with her listening to gospel music and clapping her hands so the City Staff and or Agents thereof, trespassed the Plaintiff and the readily quantifiable effects of the defendant's wrongful actions caused the plaintiff to **losses by Enforcing upon her a Trespass or Removal by Police for 6.5 Months after religious service or worship** resulting to her having no other options in Las Vegas but to be living on the streets and not at the shelter for 6.5 months the return date given to be qualified to return to the property is MARCH 16, 2025 AT 5AM TRESPASS IN THE SYSTEM and the Plaintiff seeks Compensatory Relief ( Non Economic ) for the loss. Jurisdiction 28 us code 1331 Subject matter Violation of Civil Rights.

## **CAUSE OF ACTION**

### **1. Violation of Civil Rights**

## **DEMAND FOR RELIEF SOUGHT**

1. The plaintiff demands this court award Compensatory non Economic Damages to the Plaintiff for INJURY 6.5 Months Trespass in the amount of \$150,000.
2. The plaintiff demands this court award Compensatory non Economic Damages to the Plaintiff for Suffering in the amount of \$75,000.
3. The plaintiff demand this court award Compensatory non Economic Damages to the Plaintiff for loss Community Services and Housing for 6.5 Months in the amount of \$150,000.

## **STATEMENT OF CLAIM UPON WHICH RELIEF CAN BE GRANTED**

The City of Las Vegas "a Government/ Government property" failed to ensure Federal Constitutional Rights would not be abridged on their Property, that is not Private Property, the Plaintiff was wrongfully Trespassed due to Religious Reasons for 6.5 months leaving plaintiff to lose Community Services and Housing for 6.5 Months and suffer Damages by their wrongful act/action and or omissions directly resulted to Injury, harm, loss and suffering And City of Las Vegas wrongfully deprived the plaintiff of Constitutional Rights in violation of US CONSTITUTION City Government while acting under State Government Breached the Plaintiff of Constitutional Rights And the plaintiff is entitled to non Economic Compensatory Relief for the Harm, Loss and Suffering caused by the Breach. City of Las Vegas Violated Plaintiff Civil Rights based on Religion in violation of US Constitution First Amendment.



**DAMAGES**

- 1. INJURY**
- 2. LOSS**
- 3. SUFFERING**

DATED THIS 18<sup>th</sup> DAY OF December 2024.

Barbara Stuart Robinson

BARBARA STUART ROBINSON